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October 1, 2004

VIA HAND DELIVERY

Hon. Pat Miller
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

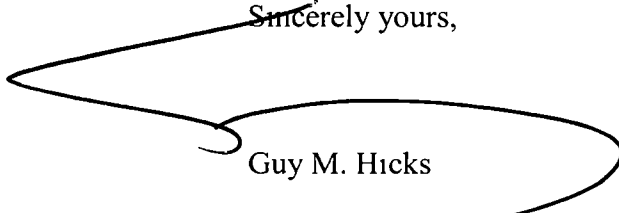
Re: *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and IDS Telcom, L.L.C. Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*
Docket No. 04-00332

Dear Chairman Miller:

Pursuant to Section 252(e) of the Telecommunications Act of 1996, IDS Telcom, L.L.C. and BellSouth Telecommunications, Inc. are hereby submitting to the Tennessee Regulatory Authority the original and fourteen copies of the attached Petition for Approval of the Amendment to the Interconnection Agreement dated February 5, 2003. The Amendment relates to Local Portability recovery.

Thank you for your attention to this matter.

Sincerely yours,


Guy M. Hicks

cc: Angel Leiro, V-P Regulatory Affairs, IDS Telcom, L.L.C.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In re. *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and IDS Telcom, L.L.C. Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*

Docket No. _____

PETITION FOR APPROVAL OF THE
AMENDMENT TO THE INTERCONNECTION AGREEMENT
NEGOTIATED BETWEEN BELL SOUTH TELECOMMUNICATIONS, INC.
AND IDS TELCOM, L.L.C.
PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996

COME NOW, IDS Telcom, L.L.C. ("IDS") and BellSouth Telecommunications, Inc., ("BellSouth"), and file this request for approval of the Amendment to the Interconnection Agreement dated February 5, 2003 (the "Amendment") negotiated between the two companies pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, (the "Act"). In support of their request, IDS and BellSouth state the following:

1. IDS and BellSouth have successfully negotiated an agreement for interconnection of their networks, the unbundling of specific network elements offered by BellSouth and the resale of BellSouth's telecommunications services to IDS. The Interconnection Agreement was approved by the Tennessee Regulatory Authority ("TRA") on March 17, 2003.

2. The parties have recently negotiated an Amendment to the Agreement which relates to Local Portability recovery. A copy of the Amendment is attached hereto and incorporated herein by reference.

3. Pursuant to Section 252(e) of the Telecommunications Act of 1996, IDS and BellSouth are submitting their Amendment to the TRA for its consideration and

approval. The Amendment provides that either or both of the parties is authorized to submit this Amendment to the TRA for approval.

4 In accordance with Section 252(e) of the Act, the TRA is charged with approving or rejecting the negotiated Amendment between BellSouth and IDS within 90 days of its submission. The Act provides that the TRA may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier not a party to the agreement or the implementation of the agreement or any portion of the agreement is not consistent with the public interest, convenience and necessity.

5. IDS and BellSouth aver that the Amendment is consistent with the standards for approval.

6. Pursuant to Section 252(i) of the Act and FCC Order No 04-164, BellSouth shall make the Agreement available upon the same terms and conditions contained therein

IDS and BellSouth respectfully request that the TRA approve the Amendment negotiated between the parties.

This 15th day of October, 2004.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301
Attorney for BellSouth

CERTIFICATE OF SERVICE

I, Guy M. Hicks, hereby certify that I have served a copy of the foregoing Petition for Approval of the Amendment to the Interconnection Agreement on the following via United States Mail on the 15th day of October, 2004:

Angel Leiro
V-P Regulatory Affairs
IDS Telecom LLC
1525 N.W. 167th Street
2nd Floor
Miami, FL


Guy M. Hicks

**Amendment to the Agreement
Between
IDS Telcom, L.L.C.
and
BellSouth Telecommunications, Inc.
Dated February 5, 2003**

Pursuant to this Amendment, (the "Amendment"), IDS Telcom, L.L.C. (IDS Telcom), and BellSouth Telecommunications, Inc. ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement between the Parties dated February 5, 2003 ("Agreement") to be effective ten (10) calendar days after the date of the last signature executing the Amendment.

WHEREAS, BellSouth and IDS Telcom entered into the Agreement on February 5, 2003 and;

WHEREAS, BellSouth and IDS Telcom are amending the Agreement to modify Local Number Portability (LNP) recovery charge pursuant to the Order in the matter of the Telephone Number Portability BellSouth Corporation Petition for Declaratory Ruling and/or Waiver, CC Docket No. 95-116, released April 13, 2004,

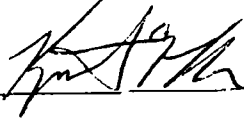
NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows

- 1 The Parties agree to delete in their entirety all rate elements and USOCs identified as "Local Number Portability charges" in Exhibit A of Attachment 2 as specified by the following USOCs: LNPCX, LNPCP, LNPCN and LNPCC, in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee.
- 2 The Parties agree to add the following language to Sections 4.1.1 and 5.7 of Attachment 2.


In addition to other charges specified in this Agreement for Local Number Portability IDS Telcom shall pay to BellSouth the Local Number Portability charges as set forth in Section 13 of the BellSouth FCC No. 1 Tariff
- 3 This Agreement shall be deemed effective ten (10) calendar days following the date of the last signature of both Parties ("Effective Date").
- 4 All of the other provisions of the Agreement, dated February 5, 2003 shall remain in full force and effect.
- 5 Either or both of the Parties is authorized to submit this Amendment to the respective state regulatory authorities for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the Parties have executed this Agreement the day and year written below

BellSouth Telecommunications, Inc.

By 
Name: Kristen E. Rowe
Title Director
Date: 8/20/04

IDS Telecom, L.L.C.

By: 
Name: Angel M. Leiro
Title V-P Regulatory Affairs
Date: 8/19/04